MARIA C. ROBERTS, State Bar No. 137907
mroberts@sheastokes.com
RONALD R. GIUSSO, State Bar No. 184483
rgiusso@sheastokes.com
SHEA STOKES ROBERTS & WAGNER, ALC
510 MARKET STREET, THIRD FLOOR
SAN DIEGO, CALIFORNIA 92101-7025
TELEPHONE: (619) 232-4261
FACSIMILE: (619) 232-4840

Attorneys for HARRAH'S ENTERTAINMENT, INC. and *Specially Appearing* Defendant HARRAH'S OPERATING COMPANY, INC.; HARRAH'S MARKETING SERVICES CORPORATION; HARRAH'S LAUGHLIN, INC.; HARRAH'S LICENSE COMPANY, LLC; and HBR REALTY COMPANY, INC.

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

JAMES M. KINDER, Plaintiff, vs. HARRAH'S ENTERTAINMENT, INC.; HARRAH'S OPERATING COMPANY, INC.; HARRAH'S MARKETING SERVICES CORPORATION; HARRAH'S LICENSE COMPANY, LLC; HARRAH'S LAUGHLIN, INC. HBR REALTY COMPANY, INC. and DOES 1 through 100, inclusive, Defendants.	CASE NO. 07-CV-2132-DMS (AJB) [Consolidated with 07 CV 2226 DMS (POR)] Judge: Hon. Dana M. Sabraw Mag. Judge: Hon. Anthony J. Battaglia DECLARATION OF MARIA C. ROBERTS IN SUPPORT OF *SPECIALLY APPEARING* DEFENDANTS' MOTION TO DISMISS PURSUANT TO F.R.CIV.P. RULE 12(b)(2), (6) ACCOMPANYING DOCUMENTS: NOTICE OF MOTION AND MOTION; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION OF MICHAEL E. KOSTRINSKY; NOTICE OF LODGMENT OF EXHIBITS; [PROPOSED] ORDER Date: April 25, 2008 Time: 1:30 p.m. Courtroom: 10

/ / /

/ / /

/ / /

/ / /

I, Maria C. Roberts, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am an attorney with Shea Stokes Roberts & Wagner, ALC, attorneys of record for Harrah's Entertainment, Inc. and *Specially Appearing* Defendant Harrah's Operating Company, Inc. and *Specially Appearing* Defendant Harrah's Marketing Services Corporation. If called as a witness, I could and would competently testify to all facts within my personal knowledge, except where stated upon information and belief.

2. This declaration is submitted in support of *Specially Appearing* Defendants' Motion to Dismiss Pursuant to F.R.CIV.P. Rule 12(b)(2), (6).

3. On November 21, 2007, *Specially Appearing* Defendant effected a timely and proper removal of the action to the United States District Court for the Southern District of California.

4. The first amended complaint was personally served on *Specially Appearing* Defendant Harrah's Laughlin, Inc., *Specially Appearing* Defendant Harrah's License Company, LLC and *Specially Appearing* Defendant HBR Realty Company, Inc. on March 7, 2008.

5. Attached to the Notice of Lodgment of Exhibits as Exhibit 1 is a true and correct copy of the Summons and Complaint for Damages, including Punitive Damages, Interest, and Attorney's Fees, and for Injunctive Relief, filed by Plaintiff James M. Kinder on October 2, 2007.

6. Attached to the Notice of Lodgment of Exhibits as Exhibit 2 are true and correct copies of the Vexatious Litigant List prepared and maintained by the Administrative Office of the Court, dated September 28, 2007; October 31, 2007; and January 31, 2008.

/ / /

7. Attached to the Notice of Lodgment of Exhibits as Exhibit 3 is a true and correct copy of the Declaration of James M. Kinder in Support of Filing by Vexatious Litigant, dated May 9, 2007.

8. Attached to the Notice of Lodgment of Exhibits as Exhibit 4 is a true and correct copy of the docket for San Diego County Superior Court Case No. 37-2007-00076114-CU-MC-CTL.

9. Attached to the Notice of Lodgment of Exhibits as Exhibit 5 is a true and correct copy of this Court's order of January 22, 2008, granting Plaintiff James M. Kinder's motion for leave to file a first amended complaint.

I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed by me on March 27, 2008 at San Diego, California.

s/Maria C. Roberts
Maria C. Roberts